



Oregon

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April 9, 2001

Sent via e-mail

Matt Cusma
Schnitzer Steel Industries
P.O. Box 10047
Portland, Oregon 97296-0047

RE: Crawford Street Corporation Site
8424 and 8524 N. Crawford Street, Portland, Oregon
Revised Sampling and Analysis Plan

Dear Mr. Cusma:

I received your (undated) letter on March 26, 2001 concerning the Oregon Department of Environmental Quality's (DEQ) February 21, 2001 comments on your revised Preliminary Assessment (PA) Sampling and Analysis Plan (SAP) for the above-referenced site. As the revised SAP was submitted after our meeting on January 23, 2001, we could not grant approval at the meeting for details described in the SAP. For example, while we generally agreed during the meeting that polycyclic aromatic hydrocarbons (PAHs) and metals would be evaluated at several potential historic contaminant sources, we did not discuss specifically which metals and analytical methods would be used. The recently revised SAP was the first time DEQ reviewed your proposed plans for evaluating these potential source areas in the southern portion of the subject property since our request for such plans described in our July 24, 2000 letter.

Based on our April 5, 2001 meeting, DEQ is proposing the following modifications to the specific numbered comments in our February 21, 2001 comment letter. The comment numbers below correspond to comments that you did not address in your recent letter.

1. Samples described in your June 14, 2000 Preliminary Assessment for the North Area and black sand should be analyzed for PAHs using Method 8310 or 8270-SIM, due to the better defined nature of the contaminant sources at these locations. Since the nature of potential contaminants is less defined for samples collected in the South Area associated with the historic operations (PP-1, PP-2, and PP-3) and the abandoned pipes (SS-6 and SS-7), these samples should be analyzed for semi-volatile organic compounds (SVOCs).
2. Petroleum is a hazardous substance in Oregon. Soil and groundwater samples should be analyzed for total petroleum hydrocarbons (TPH) to evaluate whether there has been a release of a hazardous substance. TPH broadly assesses petroleum hydrocarbons, whereas PAHs are a subset of TPH. Both TPH and PAHs should be analyzed where petroleum contamination is suspect, which in this case is the entire site.

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3. The black sand should be analyzed for TPH (see #2), but metals analyses can be limited to the four metals previously agreed upon (lead, mercury, cadmium, and chromium). This is based on the understanding that the sandblast material was used to clean petroleum tanks.
4. TPH analyses should be conducted per comment #2.
6. Due to the suspected nature of contaminants associated with the former foundry/machine shop, it is acceptable to analyze for PAHs in sample PP-3 using Method 8310 or 8270-SIM. As per comment #2, samples from PP-3 should include TPH analyses.
9. As per comments #1 and #2, samples beneath the two abandoned pipes should be analyzed for SVOCs (instead of PAHs) and TPH. Polychlorinated biphenyls (PCBs) analysis is not required since this substance is not directly related to the abandoned pipes.

Surface soil samples beneath the three newly discovered abandoned pipes along the riverfront should be analyzed the same as the other abandoned pipes (see comment #9 above). The surface soil sample from the metal debris should be analyzed for arsenic, chromium, copper, nickel, zinc, and lead.

Where total metal concentrations in soil samples exceed background levels (see values for Clark County in *Natural Background Soil Metals Concentrations in Washington State*, which can be accessed at <http://www.ecy.wa.gov/programs/tcp/pu94115.htm>), TCLP analysis should also be conducted. TCLP results should be compared to ambient water quality criteria to evaluate potential impacts to the Willamette River.

I understand that fieldwork planned for April 10, 2001 has been postponed. An alternative start date within the next two weeks should be specified. Please let me know when subsurface sampling will be conducted in the southern portion of the site, as we may wish to observe some of this activity. Please call me if you have questions.

Sincerely,

Tom Gainer, P.E.
Project Manager

cc: Ross Rieke, Bridgewater Group
Rod Struck, DEQ/NWR
Eric Blischke, DEQ/NWR

Mr. Matt Cusma
April 9, 2001
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Michael Rosen, DEQ/NWR

DEQ